

1 **Mark J. Werksman, Esq. - CSB No. 120767**
2 **LAW OFFICES OF MARK J. WERKSMAN**
3 **801 South Figueroa Street, 11th Floor**
4 **Los Angeles, California 90017**
5 **Tel: (213) 688-0460 /Fax: (213) 624-1942**

E-filed 5/29/07

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Attorneys for Defendant
Alexander Dzhuga

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THE UNITED STATES OF
AMERICA,

Plaintiff,

v.

ALEXANDER DZHUGA,
et al.

Defendant.

CASE NO. CR-05-00589-JF

**STIPULATION TO CONTINUE
SENTENCING HEARING**

**TO: THE HONORABLE HONORABLE JEREMY FOGEL, JUDGE OF
THE UNITED STATES DISTRICT COURT AND TO ASSISTANT UNITED
STATES ATTORNEY RICHARD C. CHENG:**

Defendants Alexander Dhuzga, Vladimir Semenov, Leonid Dzhuga, Natalia
Stadnik, and Armond Tollett, II, by and through their respective counsels of
record, and the United States of America, by and through its representative,
Assistant United States Attorney Richard C. Cheng, hereby agree and stipulate
that the Sentencing Hearing currently set for June 18, 2007, be continued to
August 14, 2007 at 10:00 a.m.

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The basis for the requested continuance is defense counsel needs additional time to receive Defendant, Alexander Dzhuga's criminal history priors from probation.

IT IS SO STIPULATED

The parties agree and stipulate that defendant's sentencing, currently set for June 18, 2007, be continued to August 14, 2007 at 10:00 a.m., or such other date as is available for the Court.


Defendant's counsel has discussed the proposed continuance with defendant who concurs with this request and the reasons stated therefore.

Dated: May 21, 2007

United States Attorney
Kevin V. Ryan

By: 
Richard C. Cheng
Assistant United States Attorney

Dated: May 21, 2007

By: 
Mark Werksman
Attorney for Defendant
Alexander Dzhuga

Dated: May 11, 2007

By: /s/ Geoffrey A. Braun (Tel. Auth.)
Geoffrey A. Braun
Attorney for Defendant
Vladimir Semenov

Dated: May 14, 2007

By: /s/ Dmitry Gurovich (Tel. Auth.)
Dmitry Gurovich
Attorney for Defendant
Leonid Dzhuga

1
2 Dated: May 14, 2007

By: /s/ Elon Berk (Tel. Auth.)

Elon Berk
Attorney for Defendant
Natalia Stadnik

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5
6 Dated: May 14, 2007

By: /s/ William S. Kroger, Jr. (Tel. Auth.)

William S. Kroger, Jr.
Attorney for Defendant
Armond Tollett, II

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10 **[PROPOSED] ORDER**

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12 **THE COURT HEREBY** continues the Sentencing hearing in this matter
13 currently set for June 18, 2007, be continued to August ~~14~~, 2007 at 10:00 a.m.
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16 **IT IS SO ORDERED**

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18 Dated: May 29, 2007

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HONORABLE JEREMY FOGEL
United States District Judge

(PROOF OF SERVICE - 1013A(3), 2015.5 C.C.P.)

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss.

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 801 South Figueroa Street, 11th Floor, Los Angeles, California 90017.

On May 22, 2007, I served the foregoing documents described as: **STIPULATION TO CONTINUE SENTENCING HEARING** on interested parties in this matter by placing a true copy in a sealed envelope addressed as follows:

Richard C. Cheng
 Assistant United States Attorney
 150 Almaden Street
 San Jose, CA 95113
 Fax No. (408) 535-5066
Attorney for United States of America

Geoffrey A Braun, Esq.
 181 Devine Street
 San Jose, CA 95110
Attorney for Vladimir A. Semenov

Dmitry Y. Gurovich, Esq.
 Gurovich & Associates
 15250 Ventura Blvd., Ste. PH-1220
 Sherman Oaks, CA 91403
Attorney for Leonid Dzhuga

Elon Berk, Esq.
 Gurovich & Associates
 15250 Ventura Blvd., Ste. PH-1220
 Sherman Oaks, CA 91403
Attorney for Natalia Stadnik

William Kroger, Jr., Esq.
 8888 Olympic Blvd.
 Beverly Hills, CA 90211
 (323) 655-5700
Attorney for Armond Tollett, II

Jaime A. Carranza
 Pretrial Officer
 Robert F. Peckham Federal Building
 & United States Courthouse
 280 South First Street, Suite 1150
 San Jose, CA 95113-3002

Lori Timmons
 Robert F. Peckham Federal Building
 & United States Courthouse
 280 South First Street, Suite 106
 San Jose, CA 95113-3002

(BY MAIL) X I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service made pursuant to C.C.P. § 1013(a) should be presumed invalid if postal cancellation date of postage meter date is more than on day after date of deposit for mailing in affidavit.

(FEDERAL) X I declare that I am employed in the office of a member of the bar of this court at whose discretion the service was made.

Executed on this 22nd day of May 2007, in Los Angeles, California.


 Martha Rodriguez